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1 2 3 4 5 6 7	MAYER BROWN LLP John Nadolenco (SBN 181128) 350 South Grand Avenue, 25th Floor Los Angeles, CA 90071-1503 Telephone: (213) 229-9500 jnadolenco@mayerbrown.com Lauren R. Goldman (pro hac vice) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 506-2647 lrgoldman@mayerbrown.com	
8	Counsel for Defendant Facebook, Inc.	
9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	SAN FRANCISCO DIVISION	
12	IN RE FACEBOOK BIOMETRIC	DECLARATION OF MARK
13	INFORMATION PRIVACY LITIGATION	ZUCKERBERG IN SUPPORT OF THE MOTION OF FACEBOOK, INC. AND MARK ZUCKERBERG TO QUASH
14 15	THIS DOCUMENT RELATES TO:	PLAINTIFFS' SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL
16	ALL ACTIONS	Master Docket No.: 3:15-CV-03747-JD
17		Hon. James Donato
18		
19	I, Mark Zuckerberg, hereby declare as follows:	
20	1. I am the Chairman and Chief Executive Officer of Facebook, Inc. ("Facebook").	
21		
22	2. I make this declaration on my own personal knowledge and, if called upon as a	
23	witness to do so, I could and would competently testify as to the matters set forth herein.	
24	3. I have been informed by counsel that the above-captioned matter is a lawsuit	
25	brought by Illinois residents under the Illinois Biometric Information Privacy Act, alleging that	
26	Facebook used facial-recognition technology to analyze their photos, and to create and store	
27	"templates" for them, without giving them adequate notice or obtaining their consent.	
28		

4. I do not have any unique personal knowledge of this case, or of any of the facts and claims at issue in this case. I was not directly involved in the creation or design of Facebook's facial-recognition technology; nor do I have day-to-day responsibility for formulating or implementing the decisions or policies related to the technology.

5. Instead, Facebook employs people who are responsible for Facebook's facial-recognition technology, the uses of that technology, and the policies related to it. I rely on periodic briefings from those individuals for my knowledge of these issues.

I declare under penalty of perjury under the laws of the State of ______and the United States that the foregoing is true and correct.

Executed this 2 day of May, 2018 in ______.

Mark Zuckerberg